

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,
Plaintiff,

v.

STEVEN K. BONNELL II,
Defendant.

**STEVEN K. BONNELL'S OPPOSITION TO PLAINTIFF'S MOTION FOR
INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO HAUGE CONVENTION**

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As defendant Steven Bonnell indicated in his Reply brief in further support of his pending Motion To Dismiss the Amended Complaint for Lack of Subject Matter Jurisdiction [ECF No. 132], he takes “no position” with respect to the “procedure” Plaintiff seeks to use to obtain materials from a non-party residing in a foreign country, i.e., filing an application through the Hauge. [ECF No. 149 at 7 n.5.] However, Bonnell disputes the relevance of the materials Plaintiff seeks from his ex-wife, who now resides in Sweden and has nothing to do with any of the allegations in Plaintiff’s Amended Complaint. (*Id.*)

Further, Bonnell objects to Plaintiff’s Motion for International Judicial Assistance [ECF No. 145] to the extent it will cause any delay in the case. Bonnell does not agree to extend the discovery cut-off date or otherwise postpone any of the other deadlines the Court previously set. (*See* Scheduling Order, dated Apr. 3, 2025 [ECF No. 23] at 1-2.)

Dated: October 20, 2025

Respectfully submitted,

**BILZIN SUMBERG BAENA PRICE &
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 20, 2025, a true and correct copy of the foregoing document is being served this day on all counsel of record, including those listed in the below Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patricia M. Patino
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Case No.: 1:25-cv-20757-JB/Torres

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